TITLE 326 AIR POLLUTION CONTROL BOARD

#07-88(APCB)

SUMMARY/RESPONSE TO COMMENTS FROM THE SECOND COMMENT PERIOD

The Indiana Department of Environmental Management (IDEM) requested public comment from August 8, 2007, through September 7, 2007, on IDEM's draft rule language. IDEM received comments from the following party:

ISG Burns Harbor LLC (ISG)

Following is a summary of the comments received and IDEM's responses thereto.

Comment: We support the draft amendments to 326 IAC 6-6-5 "Bethlehem Steel Corporation fugitive dust control strategy". The amended rule will allow more flexibility to employ improved technologies on a schedule based on actual plant operations. The amount of paved and unpaved roads and their configurations have changed over the last 20 years, so that the map and mileage requirements of 326 IAC 6-6-5 are no longer accurate. (ISG)

Response: IDEM agrees that the draft amendments to 326 IAC 6-6-5 will provide more efficient use of resources and provide equivalent or improved fugitive particulate matter emission control. IDEM believes that the section of the draft rule amending 326 IAC 6-6-5 provides thorough guidance on how to address the potential fugitive particulate matter emissions, and that the draft amendments to 326 IAC 6-6-5 will result in a plan that is easier to modify as new technologies or business practices are introduced, and will also result in more efficient and less costly fugitive particulate matter control strategies.

Comment: We suggest that "Bethlehem Steel Corporation" and "Bethlehem" be deleted and replaced throughout 326 IAC 6-6-5 with "ISG Burns Harbor LLC". (ISG)

Response: IDEM agrees, and has proposed the appropriate changes in this rulemaking.

Comment: We support the draft amendment to 326 IAC 7-4-14 removing the SO_2 emission limit for the blast furnace gas flare. Removing the SO_2 emission limit for the blast furnace gas flare will increase regulatory consistency, result in no increase in the actual emissions of SO_2 and no operational changes at ISG Burns Harbor LLC, result in no impact on modeled emissions, and will eliminate an outdated standard. (ISG)

Comment: There is no SO_2 emission limit for the blast furnace gas flare at U.S Steel Gary Works in neighboring Lake County. Air quality modeling conducted for U.S. Steel Gary Works accounted for the use of more blast furnace gas in the other combustion units than could be produced. IDEM agreed that including the blast furnace flares in the Lake County SO_2 attainment demonstration model was not appropriate when all potentially available blast furnace

gas is accounted for in modeled emissions from other combustion units. Because ISG Burns Harbor's system for blast furnace gas combustion is identical to that used by Gary Works, the SO_2 emission limit for the 326 IAC 7-4-14 blast furnace gas flare can be eliminated without affecting Porter County's demonstrated SO_2 NAAQS attainment. (ISG)

Comment: IDEM should eliminate the 326 IAC 7-4-14 blast furnace gas flare SO_2 emission limit because the emission factor used to generate the emission limitation of 0.07 lb/MMBtu is inherently difficult to validate and has not been peer reviewed or incorporated in U.S. EPA's Compilation of Emission Factors. (ISG)

Response: IDEM agrees that there will be no negative environmental impact on the ambient air quality with respect to SO_2 emissions as a result of this rulemaking. Air quality modeling performed to establish the 326 IAC 7-4-14 SO_2 emission limits for emission points at the steelmaking plant attribute 100% of the available blast furnace gas to being used in the blast furnace stoves, coke ovens, and the power station boilers. Compliance with the SO_2 emission limits established for the processes using blast furnace gas assures protection of the National Ambient Air Quality Standard (NAAQS) for SO_2, regardless of the presence of an SO_2 emission limit for the blast furnace gas flare. IDEM acknowledges that SO_2 emission limits are not imposed on flares for any other steelmaking operations or for any other flares in Indiana. IDEM agrees that add-on control technologies do not currently exist for SO_2 emission control at blast furnace gas flares, and that the blast furnace gas flare is a necessary control device for the safe operation of the blast furnace gas distribution system. IDEM further agrees that because the sulfur content present in raw materials processed at ISG Burns Harbor LLC's blast furnaces is highly variable, and that the nature of the steelmaking process requires a continuous addition of raw materials to the blast furnace, it is technically infeasible to manage the sulfur content of the materials charged in the blast furnace to achieve compliance with the blast furnace flare SO_2 emission limit. For these reasons, IDEM agrees that it is appropriate and necessary to remove the SO_2 emission limit for ISG Burns Harbor LLC's blast furnace gas flare from 326 IAC 7-4-14.